

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

Criminal No. 12-691 (PAD)

JOEL PAGAN-RIVERA, et al.,
Defendant.

**UNITED STATES' MOTION IN COMPLIANCE WITH COURT ORDER AT ECF
NUMBER 2835**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, through the undersigned attorney, and to this Honorable Court very respectfully states and prays as follows:

1. This case involves a vast drug-trafficking spanning from 2007 to 2012 in Ponce, Puerto Rico. (*See* ECF No. 3). Firearms were possessed as part of the drug-trafficking conspiracy. (ECF No. 1036).

2. The Defendant was sentenced to 87 months, which was later reduced to 70 months. (ECF Nos. 1368, 2682).

3. After the Defendant's federal sentence was imposed, he also served state sentences for the following offenses:

- a. Auto theft-Case No. JPD1998G0760 stemming from April 2, 1998 arrest
- b. PR Weapons Law violations in Case Nos. JLA2012G0079 to 80, JLA2012G0078, and JLA2012G0081 stemming from February 2, 2011 arrest
- c. Illegal possession of cell phone in Case No. ALE2018G0145

4. The Defendant's Judgment did not state whether his federal sentence should run consecutively or concurrently to the above state sentences.

5. On March 13, 2025, the BOP wrote to the district court for guidance on whether the federal sentence should run consecutively or concurrently to the state sentences. (ECF No. 2834-1).

6. The Court ordered the government to state its position. (ECF No. 2835).

7. The government has no objections to the sentences in category b. above (Case Nos. JLA2012G0079 to 80, JLA2012G0078, and JLA2012G0081 for firearms violations) running concurrently to the instant case, since the date, location, and conduct of the state violations indicate they may be for relevant conduct with the instant federal case.

8. However, the violations in categories a. and c. above (Auto theft-Case No. JPD1998G0760 and Illegal possession of cell phone in Case No. ALE2018G0145) are completely unrelated to the instant federal case. Thus, the instant federal sentence should run consecutively to these sentences.

WHEREFORE, the United States requests that the Court take notice of the instant motion and deem the United States in compliance with the Order at ECF No. 2835.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this April 15, 2025.

W. STEPHEN MULDROW
UNITED STATES ATTORNEY

/s/ Antonio L. Perez-Alonso
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was uploaded today, April 15, 2025, into the Court's website using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Antonio L. Perez-Alonso
Antonio L. Perez-Alonso – G02902
Assistant United States Attorney